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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

JPMORGAN CHASE BANK, N.A., a  
national banking association,  
  
Plaintiff,

v.

SFR INVESTMENTS POOL 1, LLC, a  
Nevada limited liability company; SEVEN  
HILLS MASTER COMMUNITY  
ASSOCIATION; and MOUSHIR  
MANIOUS, an individual.

Defendants.

CASE NO.: 2:17-cv-00004-GMN-CWH

**STIPULATION AND ORDER TO  
EXTEND SCHEDULING ORDER  
DEADLINES BY 60 DAYS**

**(First Request)**

SFR INVESTMENTS POOL 1, LLC, a  
Nevada limited liability company

Counter/Cross-Claimant,

v.

JPMORGAN CHASE BANK, N.A., a  
national banking association; UNITED  
GUARANTY RESIDENTIAL INSURANCE  
COMPANY OF NORTH CAROLINA;  
MOUSHIR, an individual

Counter/Cross-Defendants.

1 Pursuant to LR IA 6-1 and LR 26-4, Plaintiff/Counter-Defendant JPMorgan  
2 Chase Bank, N.A. ("Chase"), Defendant/Counterclaimant/Cross-Claimant SFR  
3 Investments Pool 1, LLC ("SFR"), and Defendant Seven Hills Master Community  
4 Association (the "HOA") stipulate and request that this Court extend discovery and  
5 dispositive motion deadlines in the above-captioned case for 60 days, to permit the  
6 parties to efficiently complete depositions and outstanding written discovery. The  
7 parties have conferred and agree that this brief extension is the most reasonable,  
8 most economical, and least burdensome way to complete discovery in this case.

9 This is the parties' first request for an extension to the scheduling order  
10 deadlines. The parties make this request in good faith and not for purposes of delay.

11 **A. Discovery Completed to Date**

12 To date, Chase has served the following discovery: initial disclosures; initial  
13 expert disclosure; requests for production to SFR; interrogatories to SFR; notice of  
14 Rule 30(b)(6) deposition of SFR; requests for production to the HOA; interrogatories  
15 to the HOA; notice of Rule 30(b)(6) deposition of the HOA; subpoena *duces tecum* to  
16 Alessi & Koenig ("Alessi"); and a subpoena for deposition testimony to Alessi.

17 To date, SFR has served the following discovery: initial disclosures; requests  
18 for production to Chase; interrogatories to Chase; requests for admission to Chase;  
19 notice of deposition of Chase.

20 **B. Specific Description of Discovery that Remains to be Completed**

21 The parties are awaiting responses to the served discovery requests and  
22 Alessi's responses to the subpoenas *duces tecum*. The Rule 30(b)(6) deposition for  
23 SFR currently is set for December 8, 2017. In addition, the parties are working to  
24 schedule Rule 30(b)(6) depositions for Alessi, the HOA, and Chase, but, as discussed  
25 below, they seek to schedule the depositions of Chase and the HOA after the current  
26 discovery cutoff.<sup>1</sup>

27 <sup>1</sup> The parties further reserve their rights to meet and confer and, if necessary, engage  
28 in motion practice regarding any discovery issues that may arise.

1 **C. Good Cause Exists for the Requested Extension**

2 Good cause exists for the requested extension, as it will provide time for the  
3 parties to complete written discovery and schedule depositions in a way that  
4 minimizes burden and increases efficiency. SFR and Chase are conferring about  
5 potential dates for the deposition of Chase's Rule 30(b)(6) designee, who lives out of  
6 state. In addition, SFR has served voluminous written discovery requests on Chase.  
7 While Chase requires additional time to respond to SFR's discovery, Chase's current  
8 response deadline is December 17, 2017—*i.e.*, only a few days before discovery ends  
9 on December 20, 2017. SFR is willing to provide Chase with an extension for its  
10 responses, but it cannot do so unless discovery is extended. Accordingly, the  
11 requested extension to the scheduling order deadlines will minimize the cost and  
12 burden to the witness and provide sufficient time for Chase to respond to SFR's  
13 discovery. It will also permit SFR to depose Chase after receiving Chase's discovery  
14 responses, a logical process that will enable SFR to conduct an efficient, productive,  
15 and targeted deposition. SFR anticipates that it will be able to significantly limit the  
16 scope of the deposition based on the responses to its written discovery.

17 In addition, the HOA's Rule 30(b)(6) designee lives in Alabama and travels to  
18 Las Vegas monthly for depositions. While Chase's counsel anticipated deposing the  
19 HOA's designee on December 14 or 15, 2017, this date is no longer practicable as  
20 counsel's office is moving to a new location on December 15, 2017. Accordingly, the  
21 next available date for the HOA's deposition is not until January, 2018.

22 Finally, this is the parties' first request to extend discovery in this case, and  
23 they seek only a 60-day extension. The parties have diligently engaged in discovery  
24 to date and seek this extension in good faith.

25 **D. Proposed Discovery Deadlines**

26 The parties request an order extending the close of discovery, the deadline to  
27 file dispositive motions, and the deadline to file a pre-trial order by 60 days. This  
28 extension is reasonable and necessary given the good cause set forth above.

Event	Current Deadline <sup>2</sup>	New Deadline
Close of Discovery	December 20, 2017	February 19, 2018 <sup>3</sup>
Dispositive Motions	January 19, 2018	March 20, 2018
Pre-Trial Order	February 20, 2018	April 23, 2018 <sup>4</sup>

**IT IS SO STIPULATED.**

Respectfully submitted this 29th day of November, 2017.

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**ORDER**

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE  
DATED: December 1, 2017

<sup>2</sup> See Scheduling Order, ECF No. 27.

<sup>3</sup> Sixty days after December 20, 2017, falls on Sunday, February 18, 2018. The deadline is thus advanced to the next judicial day.

<sup>4</sup> Sixty days after February 20, 2018, falls on Saturday, April 21, 2018. The deadline is thus advanced to the next judicial day.